

U.S. Department of Justice

United States Attorney Eastern District of New York

MAA/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

October 29, 2024

By Email and ECF

Douglas A. Axel Michael A. Levy Jennifer Saulino Daniel Rubinstein Ellyce R. Cooper Melissa Colon-Bosolet Sidley Austin LLP

David Bitkower Matthew S. Hellman Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Department of Defense records.	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0124183349 – DOJ_HUAWEI_A_0124183407
Huawei vendor record.	SDM	DOJ_HUAWEI_A_0124183408 - DOJ_HUAWEI_A_0124183410
Records regarding North Korea.	SDM	DOJ_HUAWEI_A_0124183411 - DOJ_HUAWEI_A_0124183424
Records regarding a former Huawei employee.	SDM	DOJ_HUAWEI_A_0124183425 - DOJ_HUAWEI_A_0124185852
Huawei vendor records.	SDM	DOJ_HUAWEI_A_0124185853 - DOJ_HUAWEI_A_0124185861
Department of Defense records.	Discovery Material ("DM")	DOJ_HUAWEI_A_0124185862 – DOJ_HUAWEI_A_0124185870
Miscellaneous law enforcement records.	DM	DOJ_HUAWEI_A_0124185871 – DOJ_HUAWEI_A_0124186141
Huawei vendor records.	DM	DOJ_HUAWEI_A_0124186142 - DOJ_HUAWEI_A_0124186190
Records regarding North Korea.	DM	DOJ_HUAWEI_A_0124186191 - DOJ_HUAWEI_A_0124186312
Records regarding a former Huawei employee.	DM	DOJ_HUAWEI_A_0124186313 - DOJ_HUAWEI_A_0124186969
Reproduced miscellaneous law enforcement record.	DM	DOJ_HUAWEI_A_0124186970 – DOJ_HUAWEI_A_0124186972

Very truly yours,

BREON PEACE United States Attorney Eastern District of New York

By: /s/ Meredith A. Arfa

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By: /s/ Laura Billings

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By: /s/ Christian Nauvel

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